

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION

R.S. LOGISTICAL SOLUTIONS, LTD,

Plaintiff,

v.

JANUS GLOBAL OPERATIONS, LLC, and  
CALIBURN INTERNATIONAL, LLC,

Defendants.

Case No. 3:21-cv-00178-DCLC-JEM

**PLAINTIFF'S MOTION TO COMPEL**

Pursuant to Rules 26, 34, and 37 of the Federal Rules of Civil Procedure, and Local Rules 7.1 and 37.2, Plaintiff R.S. Logistical Services, Ltd (“RSLS”), by and through its undersigned attorneys, respectfully moves the Court to compel Defendants Janus Global Operations, LLC (“Janus”) and Caliburn International, LLC (“Caliburn”) (collectively, “Defendants”) to produce documents requested by RSLS and subject to the Court’s Order dated August 26, 2022, (ECF No. 65), granting RSLS’s Motion to Compel, (ECF No. 42), and denying Defendants’ Motion for Protective Order, (ECF No. 49).

For the reasons stated herein and in Plaintiff’s Memorandum in Support, RSLS moves the Court for an order (1) compelling the production of documents as ordered in the Court’s August 26 Order without delay, and (2) awarding RSLS its attorneys’ fees incurred in bringing the instant Motion, pursuant to Federal Rules of Civil Procedure 37(a)(5)(A) and 37(b)(2)(C).

Respectfully submitted,

Dated: November 4, 2022

/s/ Kimberly P. West

Kimberly West (MA #635401) *pro hac*

Michael J. Sullivan (MA #487210) *pro hac*

Nathan P. Brennan (MN #389954) *pro hac*  
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***Local Counsel for Plaintiff***

**RULE 37 CERTIFICATE OF CONSULTATION**

Pursuant to Fed. R. Civ. P. 37(a)(1), I hereby certify that counsel for RSLs has in good faith conferred with counsel for Defendants by phone and email in an effort to obtain the above requested relief without Court action.

/s/ Kimberly P. West  
Kimberly West

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document has been served on counsel of record on this 4<sup>th</sup> day of November 2022, via the Court's ECF system.

/s/ Kimberly P. West

Kimberly P. West